

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 1:05-cr-00472-15
)	
PHILLIP KING)	
)	
Defendants.)	

**DEFENDANT PHILLIP KING'S MOTION FOR REDUCTION OF SENTENCE/
COMPASSIONATE RELEASE PURSUANT TO 18 U.S.C. § 3582 (c)(1)(A)**

NOW COMES the Defendant, Phillip King, by and through his attorney, Jonathan D. Feldman, and hereby requests this Honorable Court grant his motion to modify an imposed term of imprisonment due to extraordinary and compelling reasons, pursuant to 18 U.S.C. § 3582 (c) (1)(a) and in support states as follows:

1. Defendant Phillip King is currently an inmate in the Bureau of Prisons, at the Federal Correctional Institution Gilmer, West Virginia, where he is serving a 217 months sentence imposed by the Honorable Judge Darrah as a result of his acceptance of responsibility and plea to count 1 of the indictment in the above captioned case for his role in a drug conspiracy case (*See Attached Exhibit of Judgment*).
2. Not only did Defendant fully accept responsibility for his conduct, but he also provided substantial assistance to the Government, assisting officers and agents significantly in their investigations into other conduct related to this case.
3. The Bureau of Prisons website currently lists Defendant as inmate register number 31880-112, with a project release date of April, 16, 2021.
4. Although Defendant is nearing the end of his sentence, there exists extraordinary and compelling reasons to pray that this Honorable Court modify the prison sentence and allow for Defendant's release from Prison now, prior to his release date, based on the fact that Defendant's father, Dexter King, is nearing the end of his life due to Parkinson's disease and

congestive heart failure, and there exists a significant likelihood that he may not be alive when Defendant is currently scheduled to be released in April, 2021 (*See Attached Medical documents*).

5. As defined by 18 U.S.C. § 3582 (c)(1)(a), the fact that Defendant, as of the writing of this motion, has served the significant majority of his sentence combined with the fact that he prays to be at his father's side as he nears the end of his life, represents an extraordinary and compelling reason to ask this Court to modify the sentence to permit this to happen.
6. It must be noted that Defendant is not a danger to the community, the underlying offense is not known to have had any allegations of violence attached to it, and after serving a lengthy sentence of imprisonment, Defendant has every incentive to abide by all conditions that he proposes allowing for his release and ability to be by his father's side as he approaches the end of his life.
7. Defendant proposes to serve the remainder of his sentence at home with his wife at 3701 West 63rd street, in Los Angeles, California, zip code 90043, to be near his father in Lancaster, California (approximately 60 miles) while he receives in home end of life hospice care.
8. Defendant prays that he be permitted to serve the remainder of his sentence on home monitoring and be allowed visits, including overnight visits if permitted, to his father's bedside at his parent's home in Lancaster, California.
9. The address of his parents is 818 e. Pondera, Lancaster, California, 93535.
10. Although Defendant himself does not have any significant medical risk factors that could lead to a more serious outcome should he contract the Covid 19 Virus, his gravely ill father does.
11. It should be noted that the required constant presence of hospice nurses who provide him bedside around the clock care coming into his father's home adds a risk of viral transmission during the Covid 19 pandemic, this very presence of these nurses providing such care are what is keeping his father alive.
12. Still, the possibility of Defendant not seeing his father before he passes from any of the aforementioned causes weighs heavily on Defendant each and every day.
13. In addition, Defendant's wife Silvia was pregnant with Defendant's now fifteen year old

daughter, Sky King, when he was taken into custody for the above captioned matter.

14. As a result of this case and his lengthy incarceration, Defendant has never been able to spend any significant personal time with his daughter, something he has long looked forward to being able to do and would immediately begin upon his proposed release that he prays for now.
15. It is the undersigned counsel's understanding that more than 30 days has passed from the receipt by the Warden of Defendant's administrative request for compassionate release.
16. This court has the statutory authority and Defendant prays that this Court uses it to allow Defendant's early release from prison for the principle purpose of being at his father's bedside as he approaches the end of his life.

WHEREFORE, Defendant Phillip King prays that this Honorable Court consider the above described extraordinary and compelling reasons listed and grant his motion for sentence modification and permit him to finish his sentence on home confinement with visits to his father's bedside while receiving home hospice care.

Respectfully Submitted,
/s/Jonathan Feldman
For Phillip King

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CERTIFICATE OF SERVICE

I, Jonathan Feldman, as Attorney for Phillip King, hereby certify that I have served all parties of record by following Defendant's **Motion for Sentence Modification due to his father's ailing health** by filing it electronically on September 2, 2020 via the CM/ECF system.

/s/Jonathan Feldman
Attorney at Law
September 2, 2020